

CENTENNIAL COMMUNICATIONS

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November 15, 2005

Kris Monteith, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-C723
Washington, DC 20554

Catherine W. Seidel, Acting Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Eleventh Quarterly Report of
Centennial Communications Corp. on E911 Compliance**

Dear Ms. Monteith and Ms. Seidel:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ and the request of Commission staff, Centennial Communications Corp. ("Centennial") hereby voluntarily files this eleventh Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on August 3, 2005. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico and the U.S. Virgin Islands, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Although Centennial initially deployed a network-based solution to effectuate E911 service in Puerto Rico, Centennial has since initiated a complete upgrade of its system there. As part of that overhaul, Centennial has upgraded from Lucent to Nortel switches, effectively replacing its entire network in Puerto Rico. As a part of that upgrade, Centennial has necessarily switched from a network- to a handset-based solution for the provision of E911 services, thus potentially increasing the overall system reliability and accuracy with which subscribers can be located in an emergency, through use of GPS-enabled devices in individual handsets.

A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004. As of Centennial's most recent report on August 3, 2005, both Phase I and Phase II service had been implemented.

With respect to the switch to a handset-based solution, Centennial is working closely with the PSAP in Puerto Rico in order to make sure that the PSAP's needs are met as soon as practicable. Significantly, Centennial has committed to maintaining its network-based E911 solution concurrently while adapting to a handset-based solution until December 31, 2006. The PSAP – Junta de Gobierno del Servicio 911 – has not indicated any objections to, or concerns with, Centennial's proposal. On November 3, 2005, Centennial notified the FCC of its change in solution to provide E911 service, and also requested a limited waiver of the December 31, 2005 95% penetration requirement set forth at 47 C.F.R. § 20.18(g)(1)(v) of the Commission's rules.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial utilizes TCS as its E911 partner and has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Indiana, Michigan and Texas markets. Centennial also notes that, to date, we have received two valid requests for Phase I E911 service from PSAPs in the state of Ohio, for Defiance and Paulding counties.

Phase II Service - As we have previously advised the Commission, we are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. Since the filing of our last quarterly report, Centennial has activated two new counties to Phase II compliance. In total, we have integrated sixty-six PSAP markets into a "Live" status. Additionally, we have seventeen markets in various stages of the implementation process. From all indications, we expect to receive one Phase II request for service from Michigan in the upcoming quarter. Since we filed our last progress report, we received a request from all of the PSAPs that we serve in Texas to initiate Phase II service with an original expected in-service date in November 2005. Due to the hurricane "Rita", however, all equipment deployment plans are on hold. We are in the process of contacting the Southeast Texas Communications Director to request an extension.

Most of the technical issues associated with GSM Phase II testing have been resolved and service implemented in all of our Midwestern markets. We are presently experiencing locating issues in St. Joseph and Elkhart Counties in Indiana. We are working with the selective router provider, TCS, and Andrew Corporation to identify and resolve the problem.

³ Baucse Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

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As of the date of this report, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi or Ohio. Centennial continues to work cooperatively with PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, Centennial is presently in compliance with all applicable Phase II deployment benchmarks. Phase I & II implementation remain a high priority with Centennial in each of the PSAP's in its domestic markets. Centennial will continue to work cooperatively with PSAPs to deliver the requested service in a timely and efficient manner.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

/s/ William Roughton

William Roughton
Vice President, Legal and Regulatory

Affairs

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